

Michael Anderson reported that he had contact with Collier and some, but limited, interaction with the Secretary. Skibine stated he had frequent contact with Duffy and Sibbison, but had never met the Secretary, and had very little contact with Collier as of the time of the Hudson decision.

IGMS staffer Thomas Hartman said he had occasional contact with Duffy and Sibbison, but little with Michael Anderson or Collier and none with Babbitt. Hartman was one of the principal IGMS employees involved in the review of the Hudson application. Manuel hired Hartman in the late summer or early fall of 1994 as a financial analyst for IGMS. Hartman had an MBA from the University of California at Berkeley, and had been involved in several businesses, but had no prior experience with Indian gaming or applications to take land into trust. Hartman told investigators that Hudson was the first land into trust application in which he was directly involved.

### **3. Consultation Process and Review of the Hudson Application**

In December 1993, in accordance with the draft Checklist, Minneapolis Area Office employees prepared form letters to fulfill the consultation requirement stating that the Four Feathers partnership had submitted an application to take land into trust and to conduct gaming in Hudson. The letters described the two-part IGRA test and solicited “findings and data” regarding whether the project would have a detrimental effect; responses were requested within 60 days.